

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:

## All Suits Against the Saint Thomas Entities

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' NOTICE OF FILING OF  
DEPOSITION NOTICES TO BELLWETHER CANDIDATE PLAINTIFFS**

The Saint Thomas Entities,<sup>1</sup> pursuant to Federal Rule of Civil Procedure 30, come now and give notice to the Court and to all parties of the issuance and filing of the following:

1. Second Amended Notice of Taking Videotaped Deposition Duces Tecum to Bellwether Candidate Plaintiff Mae Parman<sup>2</sup>
2. Amended Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Anna Sullivan and Plaintiff C. Dale Sullivan<sup>3</sup>

<sup>1</sup> Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

2 Ex. 1.

3 Ex. 2.

Dated: December 10, 2015

SAINT THOMAS HEALTH, SAINT  
THOMAS NETWORK, and SAINT  
THOMAS WEST HOSPITAL

By their attorneys,

/s/ Sarah P. Kelly  
Sarah P. Kelly (BBO #664267)  
skelly@nutter.com

NUTTER McCLENNEN & FISH LLP  
Seaport West  
155 Seaport Boulevard  
Boston, Massachusetts 02210  
(617) 439-2000  
(617) 310-9461 (FAX)

OF COUNSEL:

Yvonne K. Puig\*  
Texas State Bar No. 16385400  
yvonne.puig@nortonrosefulbright.com  
Adam T. Schramek\*  
Texas State Bar No. 24033045  
adam.schramek@nortonrosefulbright.com  
Eric J. Hoffman\*  
Texas State Bar No. 24074427  
eric.hoffman@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 536-2450  
(512) 536-4598 (FAX)

Marcy Hogan Greer\*  
Texas State Bar No. 08417650  
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON &  
TOWNSEND LLP  
515 Congress, Suite 2350  
Austin, Texas 78701  
(512) 482-9300  
(512) 482-9303

\*Appearing Pro Hac Vice

**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 10th day of December, 2015.

/s/ Sarah Kelly

Sarah P. Kelly